

44-3196-299

12:14 08/14/09
L. Miller
10619 South Jordan Pkwy, South Jordan #300
Don White

KELLY G. CARDON, UBN 0570
Attorney for Plaintiff
3856 Washington Blvd.
Ogden, Utah 84403
Telephone: (801) 627-1110

COPY

IN THE FIRST JUDICIAL DISTRICT COURT
FOR CACHE COUNTY, STATE OF UTAH

DAWN SUMMER HANSEN,

Plaintiff,

SUMMONS

vs.

STATE FARM AUTOMOBILE INSURANCE
aka STATE FARM INSURANCE COMPANIES,

Case No. 090100665
Judge Willmore

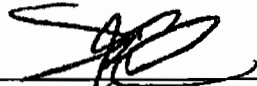
Defendant.

THE STATE OF UTAH TO THE ABOVE NAMED DEFENDANT:

You are hereby summoned and required to file an answer in writing to the attached Complaint with the Clerk of the above Court, and to serve upon, or mail to Kelly G. Cardon, Plaintiff's attorney, 3856 Washington Boulevard, Ogden, Utah 84403, a copy of said answer, within 20 days after service of this Summons upon you.

If you fail to do so, judgment by default will be taken against you for the relief demanded in this Complaint, which has been filed with the Clerk of said Court and a copy of which is hereto annexed and herewith served upon you.

DATED this 10th day of March, 2009.


KELLY G. CARDON
Attorney for Plaintiff

REC'D MAR 11 2009

KELLY G. CARDON, UBN 0570
Attorney for Plaintiff

EXHIBIT "A"

accident and at the time of said accident insured by State Farm Insurance under her Court appointed Guardians' policy and entitled to certain benefits under said policy.

5. State Farm denied payment of said benefits in bad faith and fair dealing.

6. Defendant State Farm had a fiduciary duty to Plaintiff. Defendant failed to maintain that duty and adequately protect Plaintiff.

7. Defendants' conduct was a breach of the covenant of good faith and fair dealing.

8. As a result of Defendants' conduct, Plaintiff has been denied benefits to which she is entitled; to compensate her for injuries and damages she incurred as a result of the auto/pedestrian accident referred to above.

9. Defendant's conduct was egregious and warrants the imposition of punitive damages to punish and deter Defendant from engaging in such conduct in the future.

10. As a direct and proximate result of Defendant's conduct, Plaintiff has been caused to suffer severe emotional and mental distress.

WHEREFORE: Plaintiff prays for judgement against Defendant State Farm as hereafter set forth.

SECOND CAUSE OF ACTION

Plaintiff alleges against Defendant Does I through V (hereafter "Does") as follows:

11. Plaintiff incorporates by this reference paragraphs 1 through 10 of this Complaint as fully and complete as if set out in detail.


12. John Does I through V, individually and jointly, contributed to causing the

incident referred to herein, and when their true names are discovered, Plaintiff will move to amend his Complaint to add the same herein.

WHEREFORE, Plaintiff prays for judgement against Defendants as follows:

1. For general damages in the minimum amount of \$250,000.00;
2. For special damages in such amount as may be proven at trial herein;
3. For interest upon the special damages suffered at the statutory rate.
4. For punitive damages as deemed appropriate;
5. For Plaintiff's costs incurred herein; and
6. For such other relief as may be deemed fair and equitable by the Court.

DATED this 10th day of March, 2009.



KELLY G. CARSON
Attorney for Plaintiff

Plaintiff's Address:
C/O 3856 Washington Blvd.
Ogden, UT 84403